

# PALMER & DODGE LLP

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September 21, 2001

## **By Hand**

Mary Cottrell, Secretary  
Department of Telecommunications and Energy  
Commonwealth of Massachusetts  
One South Station  
Boston, MA 02110

**Re: D.T.E. 01-20 – UNE Rates**

Dear Secretary Cottrell:

On behalf of AT&T, I have enclosed supplemental responses to VZ-ATT 1-20, 1-21, 1-24, 1-25, 1-26, 1-78, 1-79, 1-82 and 1-83. These answers are being provided in compliance with the Hearing Officer's Ruling on Verizon's Motion to Compel which was issued on August 8, 2001, and the Interlocutory Order on Verizon's Appeal which was issued on August 31, 2001. The only responses which were the subject of the August 8 and August 31 orders which remain outstanding are VZ-ATT 1-23, 1-76, 1-77 and 2-1. VZ-ATT 1-23 was the subject of AT&T's Motion for Reconsideration which was filed on September 7, 2001, and which has yet to be ruled upon by the Department. The information responsive to VZ-ATT 1-76, 1-77 and 2-1 was being compiled by AT&T employees who are now involved in the World Trade Center recovery effort. Therefore, these responses are not yet complete. AT&T hopes to provide these responses in the near future.

The attachment to VZ-ATT 1-26 is being provided in CD-ROM format only. One copy will be provided to the hearing officer and one copy will be provided to Verizon. If any other party wishes to have a copy of this CD-ROM, AT&T will provide one upon request. The CD-ROM contains proprietary information and should not be placed on the public record. The response to VZ-ATT 1-21 also contains proprietary information, is not being provided in electronic format and should not be placed on the public record. I have enclosed a Motion for Protective Treatment that deals with both of these responses. Finally, AT&T notes that the attachments to VZ-ATT 1-82 and 1-83 are being provided in paper format only because they are not readily available in electronic format.

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Please date stamp the enclosed copy of this letter and return it to the waiting messenger.  
Thank you for your attention to this matter.

Very truly yours,

Kevin R. Prendergast

*enclosures*

pc: Service List  
Kenneth W. Salinger, Esq.